

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**NOTICE OF *AMENDED*² AGENDA OF MATTERS SCHEDULED FOR HEARING
ON OCTOBER 31, 2023 AT 10:30 A.M. (ET)**

**THE REMOTE HEARING WILL BE CONDUCTED ENTIRELY BY ZOOM AND
REQUIRES ALL PARTICIPANTS TO REGISTER IN ADVANCE. COURTCALL
WILL NOT BE USED TO DIAL IN. PLEASE USE THE FOLLOWING LINK TO
REGISTER FOR THE HEARING:**

<https://debuscourts.zoomgov.com/meeting/register/vJlsfu6qqD8oE4C7JiuPUTjObKepHCPILi8>

**ONCE REGISTERED, PARTIES WILL RECEIVE A CONFIRMATION EMAIL
CONTAINING PERSONAL LOG-IN INFORMATION FOR THE HEARING.**

I. MATTERS GOING FORWARD:

1. Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notice, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief [[Docket No. 467](#) – filed September 22, 2023]

Response/Objection Deadline: October 6, 2023 at 4:00 p.m. (ET); extended until October 27, 2023 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors

Responses/Objections Received:

A. Objection by the U.S. Securities and Exchange Commission to Debtors'

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Amended items appear in bold.

Motion to Approve Disclosure Statement, Plan and Solicitation Procedures, Forms and Ballots and Other Relief, and Reservation of Rights [[Docket No. 522](#) – filed October 6, 2023]

- B. Lead Plaintiff's Objection to the Debtors' Disclosure Statement and Disclosure Statement Motion [[Docket No. 525](#) – filed October 6, 2023]
- C. Delaware Class Plaintiffs' Objection to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notice, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief [[Docket No. 526](#) – filed October 6, 2023]
- D. Objection of Foxconn Parties to Debtors' Disclosure Statement with Respect to Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [[Docket No. 528](#) – filed October 6, 2023]
- E. Objection of Ride Investor Group to Approval of the Debtors' Disclosure Statement [[Docket No. 529](#) – filed October 6, 2023]
- F. Objection of the United States Trustee to Approval of Disclosure Statement and Solicitation Procedures [[Docket No. 537](#) – filed October 10, 2023]

Related Documents:

- i. Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [[Docket No. 360](#) – filed September 1, 2023]
- ii. Disclosure Statement Pursuant to 11 U.S.C. Section 1125 with Respect to Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [[Docket No. 361](#) – filed September 1, 2023]
- iii. Notice of Hearing to Consider Approval of Disclosure Statement for the Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [[Docket No. 362](#) – filed September 1, 2023]
- iv. Notice of Rescheduled Hearing to Consider Approval of Disclosure Statement for the Joint Chapter 11 Plan of Lordstown Motors Corp. and its Debtor Affiliates [[Docket No. 539](#) – filed October 11, 2023]
- v. First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [[Docket No. 605](#) – filed October 24, 2023]

- vi. Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [[Docket No. 606](#) – filed October 24, 2023]
- vii. Notice of Filing of Blackline of (A) Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors and (B) Amended Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [[Docket No. 607](#) – filed October 24, 2023]
- viii. **Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors** [[Docket No. 624](#) – filed October 29, 2023]
- ix. **Disclosure Statement Pursuant to 11 U.S.C. § 1125 With Respect to Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors** [[Docket No. 625](#) – filed October 29, 2023]
- x. **Notice of Filing of Blackline of (A) Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors; and (B) Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors** [[Docket No. 626](#) – filed October 29, 2023]
- xi. **Debtors' Omnibus Reply in Support of Request for Approval of Disclosure Statement Motion** [[Docket No. 627](#) – filed October 30, 2023]
- xii. **Notice of Filing of Revised Proposed Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms Of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief** [[Docket No. 628](#) – filed October 30, 2023]
- xiii. **Supplemental Objection of Ride Investor Group to Approval of the Debtors' Disclosure Statement** [[Docket No. 630](#) – filed October 30, 2023]
- xiv. **Order Pursuant to Local Rule 9006-1(d) Granting Debtors' Motion for Leave to File Late Reply of the Debtors' Omnibus Reply in Support of Request for Approval of Disclosure Statement** [[Docket No. 632](#) – entered October 30, 2023]

Status: The objections of the U.S. Securities and Exchange Commission, the Delaware Class Plaintiffs, the U.S. Trustee and Foxconn are resolved by changes to the Modified Amended Plan and Modified Amended Disclosure Statement. The Debtors intend to file further revised documents in advance of the hearing and are working to resolve the remaining objections. The hearing is going forward.

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Dated: October 30, 2023
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u> WOMBLE BOND DICKINSON (US) LLP Donald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330 don.detweiler@wbd-us.com morgan.patterson@wbd-us.com</p> <p><i>Proposed Counsel to the Debtors and Debtors in Possession</i></p>	<p>WHITE & CASE LLP Thomas E Lauria (admitted <i>pro hac vice</i>) Matthew C. Brown (admitted <i>pro hac vice</i>) Fan B. He (admitted <i>pro hac vice</i>) 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 Telephone: (305) 371-2700 tlauria@whitecase.com mbrown@whitecase.com fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>) 111 South Wacker Drive, Suite 5100 Chicago, IL 60606 Telephone: (312) 881-5400 jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>) Doah Kim (admitted <i>pro hac vice</i>) RJ Szuba (admitted <i>pro hac vice</i>) 555 South Flower Street, Suite 2700 Los Angeles, CA 90071 Telephone: (213) 620-7700 rkampfner@whitecase.com doah.kim@whitecase.com rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
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